

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 102

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Weingarten, Reid](#); [Heberlig, Brian](#); [Silverman, Nicholas](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** Production  
**Date:** Monday, March 9, 2020 7:24:36 PM  
**Attachments:** [2020.03.09 Government Production.pdf](#)

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Counsel:

Attached are email communications with OFAC related to this case that SAUSA Lynch found today. The PowerPoint attached at the end of this PDF was attached to SAUSA Lynch's email on Page 15 of the PDF. Please see, in particular, Pages 7 and 15 of the PDF. We will describe these materials in our letter to the Court this evening, but we are producing all of it to you now.

Also, we agree to the stipulation you presented to the Court this afternoon. If you'd like to discuss any of the attached or revisions to the stipulation, we are available any time.

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 103

**From:** [Krouse, Michael \(USANY\)](#)  
**To:** [Emil J. Bove \(Emil.Bove@usdoj.gov\)](#); [Kim, Jane \(USANY\) 4](#); [Lake, Stephanie \(USANY\)](#); [Crowley, Shawn \(USANY\)](#)  
**Subject:** Here is a draft letter  
**Date:** Monday, March 9, 2020 8:40:00 PM  
**Attachments:** [2020.03.09 Letter re OFAC contacts.docx](#)

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Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2279

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 104

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** RE: Here is a draft letter  
**Date:** Monday, March 9, 2020 10:10:12 PM  
**Attachments:** [Ex. A.pdf](#)  
[Ex. B Email from GL.pdf](#)

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Attached.

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**From:** Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 9:58 PM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Subject:** RE: Here is a draft letter

Can you send me exs a and b please

---

**From:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 8:40 PM  
**To:** Bove, Emil (USANYS) <EBove@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Subject:** Here is a draft letter

Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2279

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 105

**From:** [Lake, Stephanie \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Bove, Emil \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** Re: Here is a draft letter  
**Date:** Monday, March 9, 2020 10:21:30 PM

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Yes we produced the Fuenmayor documents.

On Mar 9, 2020, at 10:16 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

[Attaching email to OFAC. Will confirm Fuenmayor doc.](#)

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 10:11 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Subject:** RE: Here is a draft letter

[Did we produce the "document in the material Fuenmayor gave us"?](#)

---

**From:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 10:10 PM  
**To:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Subject:** RE: Here is a draft letter

[Attached.](#)

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 9:58 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Subject:** RE: Here is a draft letter

[Can you send me exs a and b please](#)

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Monday, March 9, 2020 8:40 PM

**To:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Crowley,  
Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>

**Subject:** Here is a draft letter

Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2279

<mime-attachment>

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 106

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Bove, Emil \(USANYS\)](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#)  
**Subject:** RE: OFAC letter diligence  
**Date:** Monday, March 9, 2020 10:22:00 PM

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At approximately 6:00 p.m. on March 8, 2020, SDNY contacted OFAC in an effort to determine what, if anything, OFAC did in response to the letter from Commerzbank reflected in GX 411. During telephone calls today, OFAC reported that it has searched its database of correspondence, and was unable to find a copy of the letter. OFAC reported further that the absence of GX 411 from this database at the present time may have been caused by modifications to the database in approximately 2012. In addition to searching the database, OFAC asked personnel in OFAC's Enforcement, Compliance, and Global Targeting components if they were familiar with the letter. As of approximately 5:00 p.m. tonight, OFAC had not identified any employees who were familiar with the letter or any investigative or enforcement steps taken by OFAC with respect to the letter.

---

**From:** Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 10:20 PM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Cc:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Subject:** OFAC letter diligence

Can you fill this in and add any more detail you got from the call? Thanks

At approximately 6:00 p.m. on March 8, 2020, SDNY contacted OFAC in an effort to determine what, if anything, OFAC did in response to the letter from Commerzbank reflected in GX 411. During telephone calls today, OFAC reported that it has searched its database of correspondence, and was unable to find a copy of the letter. OFAC reported further that the absence of GX 411 from this database at the present time may have been caused by modifications to the database in approximately 2012. In addition to searching the database, OFAC asked personnel in OFAC's Enforcement, [XX], and [XX] components if they were familiar with the letter. As of [TIME], OFAC had not identified any employees who were familiar with the letter or any investigative or enforcement steps taken by OFAC with respect to the letter.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 107

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)  
**Cc:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#)  
**Subject:** RE: Time Sensitive Question  
**Date:** Monday, April 27, 2020 5:31:00 PM

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Thanks, Kaveh. We'll let you know if we have any other questions.

Mike

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**From:** Kaveh.Miremadi@treasury.gov <Kaveh.Miremadi@treasury.gov>  
**Sent:** Monday, April 27, 2020 10:59 AM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Cc:** Bove, Emil (USANYS) <EBove@usa.doj.gov>; Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>  
**Subject:** RE: Time Sensitive Question

Hey Mike,

OFAC can confirm that on June 20, 2011 it received the letter you reference in your email dated April 14, 2020. The letter was not a self-disclosure or other correspondence requiring a response from OFAC. While it is possible that the information contained in the letter was passed on to other components within OFAC for their consideration, we cannot confirm at this time how or whether the information contained in the letter was used.

Thank you,  
Kaveh

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**From:** Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Sent:** Friday, April 17, 2020 12:09 PM  
**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>  
**Cc:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>; Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>  
**Subject:** RE: Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Kaveh, I just wanted to check in on this, since there is some time sensitivity. Do you think you'd be able to let us know by Monday or Tuesday of next week? I know this is a crazy time, and we really appreciate all your help.

Thanks!

Mike

---

**From:** Krouse, Michael (USANYS)  
**Sent:** Wednesday, April 15, 2020 10:38 PM  
**To:** [Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)  
**Cc:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Subject:** Re: Time Sensitive Question

Thanks Kaveh! It's relatively urgent, since we're trying to send a letter to the defense this week or early next week. We basically just would like to know if there is a record that the letter was received and, if so, what, if anything was done in response.

Sent from my iPhone

On Apr 15, 2020, at 10:15 PM, "[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)" <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Thanks, Mike. This could help. I forwarded the information to our Compliance division to assist in their efforts. They would like to know how urgent this request is so that they can prioritize accordingly given the circumstances.

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**From:** Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Date:** April 14, 2020 at 3:53:12 PM EDT  
**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>  
**Cc:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>, Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>, Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>  
**Subject:** RE: Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments.  
Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Kaveh,

We spoke during our trial about the letter that Commerzbank sent to OFAC (attached).  
Based on our review, it appears that this letter was sent to OFAC Compliance at the

following email address: [ofac\\_feedback@do.treas.gov](mailto:ofac_feedback@do.treas.gov) on June 20, 2011. The sender was Vinay Jepal, a Sanctions Compliance Officer with Commerzbank.

On June 22, 2011, "Leslie" from OFAC Compliance responded, stating: "Vinay, We have received your correspondence, and we'll be in touch if further action is required."

Would this information help you find out what, if anything, OFAC did with this letter?

Thanks,

Mike

---

**From:** [Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov) <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>  
**Sent:** Monday, March 9, 2020 4:35 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Cc:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>;  
[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov); [Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov); Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov); Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Subject:** Re: Time Sensitive Question

I'm available now for a call. Thanks.

---

**From:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>  
**Date:** March 9, 2020 at 4:07:18 PM EDT  
**To:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>  
**Cc:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>, Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>, Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>, Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>, Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>, [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov) <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>, Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>, Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>  
**Subject:** Re: Time Sensitive Question

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Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Kaveh, just tried your cell. Please let me know when you're free to talk. Thanks.

On Mar 9, 2020, at 10:50 AM, "[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)"  
<[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Cell: 202-746-4485

---

**From:** Bove, Emil (USANYS) <[Emil.Bove@usdoj.gov](mailto:Emil.Bove@usdoj.gov)>  
**Sent:** Monday, March 9, 2020 10:25 AM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>  
**Cc:** Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>; Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; [LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov); Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Crowley, Shawn (USANYS) <[Shawn.Crowley@usdoj.gov](mailto:Shawn.Crowley@usdoj.gov)>  
**Subject:** Re: Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov) \*\*

Hi Kaveh, what number can we reach you at?

On Mar 9, 2020, at 10:04 AM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

I don't. I'm adding my Chiefs to this chain.

On Mar 9, 2020, at 9:23 AM,  
"[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)"  
<[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)> wrote:

Hi Jane,

Do you know who or what division in OFAC this letter was sent to? I'm searching our records now. We may not be able to get you a comprehensive answer this morning.

Kaveh

---

**From:** Kim, Jane (USANYS) 4

<[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>

**Sent:** Sunday, March 8, 2020 5:58 PM

**To:** Miremadi, Kaveh

<[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Van

Wagenberg, Maria-Helene

<[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>;

Brewer, Jacqueline

<[Jacqueline.Brewer@treasury.gov](mailto:Jacqueline.Brewer@treasury.gov)>

**Cc:** Lake, Stephanie (USANYS)

<[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Krouse, Michael

(USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>; Lynch,

Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch,

Garrett (USANYS) [Contractor]

<[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>

**Subject:** Time Sensitive Question

**\*\* Caution:** External email. Pay attention to suspicious links and attachments. Send suspicious email to [suspect@treasury.gov](mailto:suspect@treasury.gov)  
\*\*

Kaveh, Maria, and Jacqui:

I'm attaching a letter dated June 16, 2011, from Commerzbank to OFAC concerning a specific payment. Could you please let us know what actions OFAC took in response to this letter? We need to update the Court on this issue tomorrow morning, so any information would be hugely appreciated.

Thank you in advance,  
Jane

Jane Kim  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, New York 10007  
Phone: (212) 637-2038  
Email: [jane.kim@usdoj.gov](mailto:jane.kim@usdoj.gov)



Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 108

**April 17, 2020 – Call with Rosanna Wells**

Present on call: Michael Krouse, Emil Bove, and Garrett Lynch

- MK asked RW what, if anything, OFAC did in response to receiving GL's emails and the powerpoint informing them about the conduct in this case
- RW stated that she does not recall seeing the powerpoint—MK said he would send the emails and the powerpoint attachment
- EB stated that we want to understand OFAC's response to those emails and the powerpoint
- RW mentioned that each enforcement response is made after considering OFAC enforcement guidelines and factors. Also stated that enforcement against an individual presents different considerations than a case against a company, since companies have a compliance program.
- Agreed to speak again Tuesday

**April 21, 2020 – Call with Rosanna Wells**

Present on call: Michael Krouse, Shawn Milione

- OFAC assesses its cases along the lines of the general factors—based on the phone call with GL, RW assessed that the case was not a promising lead for OFAC, based on those factors
- One of the factors RW considers in deciding whether to pursue an OFAC action is whether the case is being prosecuted criminally—OFAC does not want to get ahead of a criminal prosecution, because a criminal case is a stronger route to take
- After receiving the PowerPoint, RW assigned the case to an enforcement officer and provided the enforcement officer with the PowerPoint. Based on RW's review of OFAC's internal database, no internal case was actually opened by that officer or anyone else.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 109

**From:** [Bove, Emil \(USANY\)](#)  
**To:** [Krouse, Michael \(USANY\)](#); [Kim, Jane \(USANY\)](#) 4; [Lynch, Garrett \(USANY\) \[Contractor\]](#); [Lake, Stephanie \(USANY\)](#)  
**Cc:** [Crowley, Shawn \(USANY\)](#)  
**Subject:** 2020.03.09 Letter re OFAC contacts.EB3.sgc.docx  
**Date:** Monday, March 9, 2020 10:48:51 PM  
**Attachments:** [2020.03.09 Letter re OFAC contacts.EB3.sgc.docx](#)

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Here is a revised draft. Please take a careful read for accuracy and stop by / call if you have any issues. Thanks guys.

Exhibits to the October 16, 2020 Declaration of Michael K. Krouse

# EXHIBIT 110

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Kim, Jane \(USANYS\) 4](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#); [Lake, Stephanie \(USANYS\)](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#)  
**Subject:** RE: 2020.03.09 Letter re OFAC contacts.EB3.sgc.docx  
**Date:** Monday, March 9, 2020 10:58:00 PM  
**Attachments:** [2020.03.09 Letter re OFAC contacts.EB3.sgc \(MKK\).docx](#)

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Looks good. One tiny nit in the attached.

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**From:** Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Sent:** Monday, March 9, 2020 10:49 PM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>  
**Cc:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Subject:** 2020.03.09 Letter re OFAC contacts.EB3.sgc.docx

Here is a revised draft. Please take a careful read for accuracy and stop by / call if you have any issues. Thanks guys.